

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 7
DISCOVERY ZONE, INC., et al.,)	
)	Case No. 99-941 (PJW)
)	(Jointly Administered)
Debtors.)	
)	

**DISCOVERY ZONE, INC.'S STATEMENT OF
ISSUES TO BE PRESENTED ON APPEAL**

Discovery Zone, Inc. ("Discovery Zone"), by its attorneys, respectfully submits its
Statement of Issues to be Presented on Appeal:

1. Under the facts and the law, did the Bankruptcy Court err in denying Debtor's Motion to Enforce Deadline Under 11 U.S.C. Section 108(c) and For Determination that Filing of Complaint is Void?
2. Under the facts and the law, did the Bankruptcy Court err in holding that the filing of the complaint on January 28, 2000 in violation of the automatic stay as provided in 11 U.S.C. § 362(a)(1) and (3) was not void?
3. Under the facts and the law, did the Bankruptcy Court err in not finding that the failure to re-file the complaint or otherwise properly commence the action within 30 days after notice of the termination of the automatic stay was in violation of 11 U.S.C. § 108(c)?
4. Under the facts and the law, did the Bankruptcy Court err in not finding that the failure to re-file the complaint or otherwise properly commence the action within 30 days after notice of the termination of the automatic stay in violation of 11 U.S.C. § 108(c) resulted in the complaint being time-barred?

5. Under the facts and the law, did the Bankruptcy Court err in concluding that the Stipulation had the effect of retroactively annulling the automatic stay without the presentation of any evidence regarding the intent of the parties?

6. Under the facts and the law, did the Bankruptcy Court err in concluding that the Stipulation had the effect of retroactively annulling the automatic stay?

7. Under the facts and the law, did the Bankruptcy court err in holding that 11 U.S.C. § 108(c) was not implicated?

8. Under the facts and the law, did the Bankruptcy Court err by finding that the Stipulation modified the stay provisions of 11 U.S.C. §362 to permit the Austins to proceed and liquidate their claims in the Court of the 11th Judicial Court in and for Miami-Dade County, Florida, Case No. 00-2457CA09?

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